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Attorneys for the Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Victor Botnari, et al,

Plaintiffs

v.

Merrick B. Garland, Attorney General, et al,

Defendants

Case No. 2:24-cv-02285-CDS-NJK

**Joint Stipulation to Stay the
Proceedings (First Request)**

[ECF No. 29]

Plaintiffs and Defendants, through their undersigned counsel, hereby stipulate and jointly request that the Court stay all deadlines in this matter and hold this case in abeyance for a period of 60 days, or until **March 9, 2025**.

The subject of this litigation concerns Plaintiff Mariia Trofimova's Form I-730 petition for her spouse, Plaintiff Victor Botnari. (Corrected Compl. ¶¶ 1–2, ECF No. 7-1.) Trofimova is an asylee and Botnari is her spouse. (*Id.* ¶¶ 10–11.) Plaintiffs assert that Botnari is eligible for derivative asylee status through Trofimova. (*Id.*) Further, the Complaint asserts Defendants have unduly delayed processing of Plaintiffs' Form I-730 petition. (*Id.* ¶¶ 33, 40.)

Although the undersigned counsel for the Federal Defendants does not yet have access to the electronic court documents available in the court docket for this case, the docket reflects that on December 10, 2024, this case was transferred to the United States District Court for the District of Nevada. (*See* ECF No. 21.) Undersigned counsel for the

1 Federal Defendants and counsel for Plaintiffs conferred regarding this case and the timing
 2 for a response as well as a status report. The Federal Defendants requested, and counsel for
 3 Plaintiffs kindly agreed to, a stay in this case up to and including March 9, 2025, to give the
 4 Federal Defendants an opportunity to gather information and formulate a position as well
 5 as consider steps that might resolve the issues raised in the Complaint without continued
 6 litigation.

7 This is the first request to stay the proceedings. This request is not sought for
 8 purposes of delay or any other improper purpose, but to facilitate the parties' efforts to
 9 resolve the matter in a "just, speedy, and inexpensive" manner consistent with Fed. R. Civ.

10 P. 1. The parties reserve the ability to seek additional time to finalize resolution, if
 11 necessary.

12 Respectfully submitted this 8th day of January 2025.

13
 14 BARSHEV, P.C.

JASON M. FRIERSON
 United States Attorney

15
 16 /s/ Sergei Shevchenko

SERGEI SHEVCHENKO

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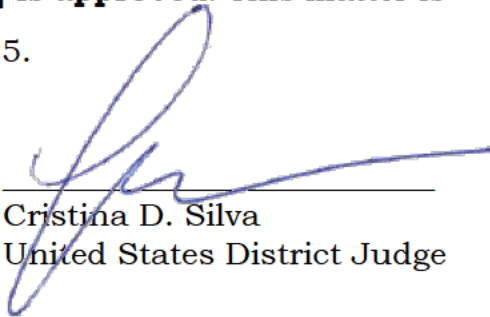
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Assistant United States Attorney

Attorneys for the United States

22
 23 The parties' stipulation **[ECF No. 29] is approved.** This matter is
 24 STAYED up to and including March 9, 2025.

25 Dated: January 13, 2025

26 
 27 Cristina D. Silva
 28 United States District Judge